

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: XXX/XX/2019

Region: Mooresville Regional Office
County: Gaston
NC Facility ID: 3600153
Inspector's Name: Karyn Barksdale
Date of Last Inspection: 05/08/2019
Compliance Code: 3 / Compliance - inspection

| Facility Data | | | Permit Applicability (this application only) |
|--|--|--|---|
| Applicant (Facility's Name): Daimler Trucks North America, LLC - Mt. Holly Plant Facility Address: Daimler Trucks North America, LLC - Mt. Holly Plant 1800 North Main Street Mount Holly, NC 28120 SIC: 3711 / Motor Vehicles And Car Bodies NAICS: 33612 / Heavy Duty Truck Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V | | | SIP: 02D .0503, 02D .0516, 02D .0521, 02D .0515, 02D .0530, 02D .0958, 02D .0952, 02D .0967, 02D .1806, 02D .1111, 02D .0524, and 02Q .0513 NSPS: Subpart JJJJ and Dc NESHAP: Subpart MMMM), PPPP, ZZZZ and DDDDD PSD: Actuals PAL for VOC, NOx and GHG emissions PSD Avoidance: NA NC Toxics: (NCGS) 143-215.107(a)(5) (House Bill 952) 112(r): NA Other: N/A |
| Contact Data | | | Application Data |
| Facility Contact Sean Quarry Environmental Engineer (704) 822-7034 1800 North Main Street Mt. Holly, NC 28120 | Authorized Contact Jane Rosaasen General Manager (704) 822-7486 1800 North Main Street Mt. Holly, NC 28120 | Technical Contact Sean Quarry Environmental Engineer (704) 822-7034 1800 North Main Street Mt. Holly, NC 28120 | Application Number: 3600153.18A Date Received: 01/31/2018 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03926/T46 Existing Permit Issue Date: 09/20/2018 Existing Permit Expiration Date: 10/31/2018 |

| Total Actual emissions in TONS/YEAR: | | | | | | | |
|--------------------------------------|--------|------|--------|------|------|-----------|------------------------------------|
| CY | SO2 | NOX | VOC | CO | PM10 | Total HAP | Largest HAP |
| 2017 | 0.0700 | 9.03 | 146.29 | 7.71 | 2.00 | 1.51 | 0.5818 [Diethanolamine] |
| 2016 | 0.0390 | 6.46 | 138.19 | 5.84 | 1.70 | 0.8678 | 0.2785 [Xylene (mixed isomers)] |
| 2015 | 0.0700 | 8.91 | 226.67 | 8.34 | 3.22 | 2.26 | 0.9745 [Xylene (mixed isomers)] |
| 2014 | 1.27 | 6.53 | 195.45 | 7.74 | 3.80 | 0.5339 | 0.1605 [Hexane, n-] |
| 2013 | 0.0800 | 8.65 | 256.86 | 9.03 | 3.47 | 3.61 | 1.05 [Ethyl benzene] |

| | |
|--|--|
| Review Engineer: Gautam Patnaik Review Engineer's Signature: _____ Date: XXX/XX/2019 | Comments / Recommendations: Issue: 03926/T47 Permit Issue Date: XXX/XX/2019 Permit Expiration Date: XXX/XX/2019 |
|--|--|

I. Facility Description

The facility is a truck manufacturing plant that produces the full line of Freightliner medium-duty business class models as well as an e-coated cab for the Western Star units built at the facility's Cleveland truck plant. The facility is currently categorized under Standard Industrial Classification (SIC) code 3711.

II. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 15A NCAC 2Q .0513. The existing Air Quality Permit No. 03926T46 was issued on September 20, 2018, and expires on October 31, 2018. The renewal application was received on January 31, 2018, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

III. Application Chronology

The table below outlines the modification to their permit starting from their last permit renewal (Air Quality Permit No. 03926T41 issued on November 5, 2013)

| Application # | Changes Made to the Permit | Permit Issued |
|---------------|---|---------------|
| 3600153.14A | Added a new natural gas fired emergency generator rated at 98 kw (ID No. ES-GEN) and a 10,000 gallons antifreeze storage tank (ID No. IES-14). Replaced six of the existing robots and added two additional robots within the 37 paint spray booths in operation. | 03926T42 |
| 3600153.15A | Addition of a spray booth to the spray coating and assembly area. | 03926T43 |
| 3600153.15B | Due to an increase in demand for trucks, the application requested the increase the VOC PAL emissions limit (by PSD/PAL procedure). In a letter dated 10/18/2016 the applicant requested that this modification to increase the VOC PAL be split into two separate applications (3600153.15B and .16A). This was done as follows: 1) Application (3600153.15B) was processed as a PSD application (15A NCAC 02Q .0501(c)(2)), satisfying the permitting requirements in 15A NCAC 02D .0530, "Prevention of Significant Deterioration." 2) Application (3600153.16A) was processed as a PSD/PAL 15A NCAC 02Q .0501(d)(1)/ 02Q .0504 significant modification. The PAL limit for VOC emissions was adjusted by this application. Therefore, the purpose of application 3600153.15B was to establish a VOC BACT limit for the increase in truck production. | 03926T44 |
| 3600153.16A | This application was processed as a PSD/PAL 15A NCAC 2Q .0501(d)(1)/ 02Q .0504 significant modification. The PAL limit for VOC emissions was increased. | 03926T45 |
| 3600153.18B | Replaced the existing natural gas-fired boiler (5.5 million Btu per hour maximum heat input, ID No. ES-ECoat-Boiler) with two new natural gas-fired natural gas fired hot water boilers (0.75 million Btu per hour maximum heat input, each, ID Nos. ES-ECoat Boiler2 and ECoat Boiler 3). | 03926T46 |

IV. Regulatory Summary

The facility is subject to the following regulations:

- i. 15A NCAC 02D .0503: “Particulates from Fuel Burning Indirect Heat Exchangers.”
- ii. 15A NCAC 02D .0516: “Sulfur Dioxide Emissions from Combustion Sources.”

There are no changes to the emission limits, testing, monitoring, record keeping and reporting requirements for the above two regulations.

- iii. 15A NCAC 02D .0521: “Control of Visible Emissions.”

All sources at this facility are subject to this regulation. There are no changes to the testing, monitoring, record keeping, or reporting requirements pertaining to this regulation for all combustions sources in Section 2.1 A., of the permit.

For sources in Section 2.1 B., of the permit, the frequency of monitoring has changed from semi-annually to once a month, in keeping with the minimum frequency as per the latest conditions required for this regulation (Section 2.1 B. 3. c., of the modified permit). For these sources the applicant shall submit a summary report of the monitoring and recordkeeping activities (Section 2.1 B. 3. e., of the modified permit).

Sources in Section 2.1 C., of the permit are now required to keep a summary report of the monitoring and record keeping activities (Section 2.1 C. 2. e., of the modified permit).

As per the applicant’s comments “currently semi annually. Why increased? Facility has not reported any VE from these sources.” Applicant requests to leave as semi annually.

As per DAQ policy the maximum duration in-between monitoring of sources to determine compliance with this regulation is a month.

- iv. 15A NCAC 2D .0515: “Particulates from Miscellaneous Industrial Processes.”

Sources under Section 2.1 B., and 2.1 C., of the permit are subject to the above regulation. However, source under Section 2.1 B., are not currently subject to the any monitoring, record keeping or reporting requirements. The modified permit requires the applicant to maintain production records. There are still no reporting requirements to demonstrate continuous compliance for these sources (Section 2.1 B. 1. c., and d., of the modified permit).

Sources in Section 2.1 C., of the permit are now required to keep a summary report of the monitoring and record keeping activities (Section 2.1 C. 1. f., of the modified permit).

- v. 15A NCAC 2D. 0530: “Prevention of Significant Deterioration” (Best Available Control Technology (BACT) limits.

To comply with the above limits the PSD designated emission sources in the spray coating and assembly operations (ES-SCAO):

- a) shall discharge into the atmosphere no more than 750 tons per year of volatile organic compounds per consecutive 12-month period, and the VOC content of the coatings used at the facility shall not exceed 3.5 pounds per gallon as applied on a calendar monthly average basis; and
- b) The Spray Coating and Assembly Operation (ES-SCAO) shall comply with MACT Subpart PPPP (Section 2.2 D.1., of the permit) and MACT Subpart MMMM (Section 2.2 D. 2., of the permit).

There are no changes to the testing, monitoring, record keeping, or reporting requirements pertaining to the above regulation in Section 2.1 B. 4., of the permit.

- vi. 15A. NCAC 02D 0958: “Work Practices for Sources of Volatile Organic Compounds.”
- vii. 15A NCAC 02D .0952: “Petition for Alternative Controls for RACT.”
for 15A NCAC 02D .0967: “Miscellaneous Metal and Plastic Parts Coatings.”

As per Section 2.2 A. 1. c. ii., of the permit compliance with Reasonably Available Control Technology or RACT was demonstrated by April 1, 2009.

On November 1, 2016, amendments to 15A NCAC 02D .0902 were finalized to narrow applicability of work practice standards in 15A NCAC 02D .0958 from statewide to the maintenance area for the 1997 8-hour ozone standard. This change is being made primarily because the abundance of biogenic VOC emissions in North Carolina results in ozone formation being limited by the amount of available nitrogen oxides (NO_x) emissions. Provisions of the Clean Air Act require VOC requirements previously implemented in an ozone nonattainment area prior to re-designation remain in place. However, facilities outside the maintenance area counties for the 1997 8-hour ozone standard would no longer be required to comply with the work practice standards in 15A NCAC 02D .0958.

Effective November 1, 2016, 15A NCAC 02D .0958 is applicable only to following counties/areas in NC:

- (1) Cabarrus County;
- (2) Gaston County;
- (3) Lincoln County;
- (4) Mecklenburg County;
- (5) Rowan County;
- (6) Union County; and
- (7) Davidson Township and Coddle Creek Township in Iredell County.

Since the facility is located in Gaston County the 15A. NCAC 02D .0958 regulation is retained in the permit.

State Only Requirement

- viii. 15A NCAC 02D .1806: “Control and Prohibition of Odorous Emissions.”
- ix. 15A NCAC 02D .1111: “National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating (MACT Subpart MMMM) and Plastic Parts and Products Surface Coating (MACT Subpart PPPP).”
- xi. 15A NCAC 02D .0524: “NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.”

There are no changes to the above regulations.

- xii. 15A NCAC 02D .1109: CAA § 112(j); “Case-by-Case MACT for Boilers & Process Heaters”

The two Natural Gas/Propane/No. 2 Fuel Oil-fired Boilers (33.6 million Btu per hour maximum heat input each, ID Nos. ES-BLR-02 and ES-BLR-05) are currently subject to 15A NCAC 2D .1109: CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters. However, this regulation does not apply past May 19, 2019, and the requirements to this rule are removed from the modified permit.

- xiii. 15A NCAC 02D .1111: “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (MACT Subpart DDDDD)”

The two Natural Gas/Propane/No. 2 Fuel Oil-fired Boilers (33.6 million Btu per hour maximum heat input each, ID Nos. ES-BLR-02 and ES-BLR-05) are subject to the above regulation, i.e., (MACT Subpart DDDDD) starting May 20, 2019. The language for this regulation is incorporated into the modified permit. Below are the requirements of applicability, definitions, nomenclature, compliance dates, notifications, general compliance requirements, work practice standards, energy assessment, record keeping and reporting requirements and their brief description of their associated MACT regulations.

These two boilers (ID Nos. ES-BLR-02 and ES-BLR-05) have oxygen trim systems so the tune ups are required every 5 years

Applicability

Per 40 CFR §63.7485, 40 CFR §63.7490(d) and 40 CFR §63.7499(l), the two natural gas/propane/No. 2 fuel oil-fired boilers (33.6 million Btu per hour maximum heat input each, ID Nos. ES-BLR-02 and ES-BLR-05) are a major source of HAPs emissions. They are designed to burn gas 1 fuels with a heat input capacity equal to or greater than 10 million Btu per hour are thus subject to MACT Subpart DDDDD.

Compliance Date

Per 40 CFR §63.7510(e) and 40 CFR §63.56(b), the sources shall be subject to the requirements of this standard starting May 20, 2019 (See Section 2.1 A. 5. a. i., of the modified permit).

Definitions and Nomenclature

The definitions and nomenclature contained in 40 CFR §63.7575 shall apply and the applicant shall only burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, and during periods of gas curtailment or gas supply interruptions of any duration (See Section 2.1 A. 5. b, and c., of the modified permit).

Notifications

40 CFR §63.7545(e): As required applicant shall conduct an initial compliance demonstration as specified in 40 CFR §63.7530, the applicant must submit a Notification of Compliance Status (NOCS) according to 40 CFR §63.9(h)(2)(ii).

For the initial compliance demonstration for each boiler the applicant must submit the NOCS, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for all boilers at the facility according to 40 CFR §63.10(d)(2).

40 CFR §63.7530(e): The applicant must include with the NOCS a signed certification that either the energy assessment was completed according to Table 3 to this subpart, and that the assessment is an accurate depiction of your facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended.

40 CFR §63.7530(f): Applicant must submit the NOCS containing the results of the initial compliance demonstration according to the requirements in 40 CFR §63.7545(e).

40 CFR §63.7545(e): Applicant must conduct an initial compliance demonstration as specified in 40 CFR §63.7530 and must submit a NOCS according to 40 CFR §63.9(h)(2)(ii). For the initial compliance demonstration for each boiler, applicant must submit the NOCS, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for all boiler at the facility according to 40 CFR §63.10(d)(2). The NOCS report must contain all the information specified in paragraphs 40 CFR §63.10(e)(1) through (8), as applicable.

The applicant shall submit a notification of intent to fire an alternative fuel (i.e., fuel oil) within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. The notification must include the information in 40 CFR §63.7545(f).

40 CFR §63.7545(f): For the boilers burning gas 1 fuels and the applicant intends to use a fuel other than natural gas or gaseous fuel during a period of natural gas curtailment or supply interruption, applicant must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption.

All the above notifications requirements are specified in Sections 2.1 A. 5. f., and g., of the modified permit.

Work Practice Standards

As per 40 CFR §63.7500(a)(1) and Table 3 of MACT Subpart DDDDD, the “work practice standards” for an existing boiler located at a major source facility, not including limited use units as specified by Table 3 to MACT Subpart DDDDD is as follows: “must have a one-time energy assessment performed by a qualified energy assessor.” (See Section 2.1 A. 5. o., of the modified permit).

As per 40 CFR §7540(a)(12): “If your boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio.... **you must conduct a tune-up of the boiler or process heater every 5 years** as specified in paragraphs (a)(10)(i) through (vi) of this section to demonstrate continuous compliance.” (See Section 2.1 A. 5. k., of the modified permit).

The applicant wanted to insert a statement “each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up.”

As per 40 CFR §63.7515(d) “If you are required to meet an applicable tune-up work practice standard, you must conduct an annual, biennial, or 5-year performance tune-up according to §63.7540(a)(10), (11), or (12), respectively. Each annual tune-up specified in §63.7540(a)(10) must be no more than 13 months after the previous tune-up. **Each biennial tune-up specified in §63.7540(a)(11) must be conducted no more than 25 months after the previous tune-up.** Each 5-year tune-up specified in §63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed affected source (as defined in §63.7490), the first annual, biennial, or 5-year tune-up must be no later than 13 months, 25 months, or 61 months, respectively, after April 1, 2013 or the initial startup of the new or reconstructed affected source, whichever is later.”

Section 2.1 A. 5. l., of the modified permit, requires for “each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up. The initial tune-up shall be conducted prior to May 20, 2019.”

For each boiler that has a heat input capacity of 10 million Btu per hour or greater, applicant must conduct tune-up of the boiler to demonstrate continuous compliance as specified in 40 CFR §63.7540(a)(10)(i) through (vi). The details of the tune-up of the boiler to demonstrate continuous compliance are specified in Section 2.1 A. 5. i., through k., and 2.1 A. 5. o., of the modified permit.

As required by 40 CFR §63.7540(a)(10)(i) through (vi) the applicant shall inspect the burner, and clean or replace any components of the burner as necessary, inspect the flame pattern, inspect the system controlling the air-to-fuel ratio, optimize total emissions of CO, measure the concentrations in the effluent stream of CO, maintain report containing the information on the concentrations of CO, description of any corrective actions, and the type and amount of fuel used over the past 12 months after the tune-up (See Sections 2.1 A. 5. i. i., through v., of the modified permit).

As per 40 CFR §63.7540(a)(13) and 40 CFR §63.7515(g): If the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup (See Sections 2.1 A. 5. j., of the modified permit).

40 CFR § 63.7500(a)(3): At all times, the applicant must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions (See Sections 2.1 A. 5. m., of the modified permit)

The applicant wanted to insert a statement “each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up.” However, the MACT Subpart DDDDD does not provide such provision.

Energy Assessment Requirements

As per Table 3 of MACT Subpart DDDDD, for “an existing boiler or process heater located at a major source facility, not including limited use units” the applicant shall have a one-time energy assessment performed by a qualified energy assessor. The energy assessment must address the requirements in 40 CFR 63 Subpart DDDDD, Table 3, with the extent of the evaluation for items (a) to (e) in Table 3, i.e., (visual inspection of the boiler, evaluation of operating characteristics of the boiler, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints, inventory of major energy use systems consuming energy from affected boilers, review of available architectural and engineering plans, facility operation, maintenance procedures, fuel usage and review of the facility's energy management program and provide recommendations for improvements) (See Sections 2.1 A. 5. o., of the modified permit).

Record keeping Requirements

63.7555(a)(1): Regarding what records to keep – the applicant must keep a copy of each notification and report that was submitted to comply with this regulation including all documentation supporting any initial NOCS or semi-annual compliance report submitted, according to the requirements in 40 CFR §63.10(b)(2)(xiv), i.e., general record keeping requirements include all documentation supporting initial NOCS (See Sections 2.1 A. 5. p., of the modified permit).

40 CFR §63.7560: records must be in a form suitable and readily available for review, records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record (See Sections 2.1 A. 5. q. i., and ii., of the modified permit).

40 CFR §63.7540(a)(10)(vi): Maintain on-site and submit, if requested by the by DAQ a report containing the information as below:

- the concentrations of carbon monoxide in the effluent stream (by volume) and oxygen measured at high fire or typical operating load, before and after the tune-up of each source,
- description of any corrective actions taken as a part of the tune-up and
- the type and amount of fuel used over the 12 months prior to the tune-up.

(See Sections 2.1 A. 5. p. ii., of the modified permit).

40 CFR §63.7555(h): for a unit designed to burn gas 1 subcategory subject to this MACT and uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another MACT, or NSPS standard the applicant must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies (See Sections 2.1 A. 5. p. iv., of the modified permit).

Reporting Requirements

The applicant wanted compliance reports reported to “DAQ on a 5-year basis.”

Boiler MACT compliance reports are due after the 5 year tune up (per Table 9 MACT Subpart DDDDD and 40 CFR §63.7550).

40.63.7550(b) “Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report, according to paragraph (h) of this section, by the date in Table 9 to this subpart and according to the requirements in paragraphs (b)(1) through (4) of this section. **For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to §63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or Table 4 operating limits, you may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of this section, instead of a semi-annual compliance report.**”

Sections 2.1 A. 5. s., of the modified permit requires “the Permittee shall submit compliance reports to the DAQ on a 5-year basis. The first report shall cover the period beginning on the compliance date specified in Section 2.1 A. 5. e., and ending on the earliest December 31st within five years from the compliance date. Subsequent 5-year reports shall cover the periods from January 1 to December 31. The Permittee shall submit the compliance reports postmarked on or before January 30.”

40 CFR §63.7550(h)(3): Requires the applicant must submit electronically all reports required by Table 9 MACT Subpart DDDDD using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX). The applicant may also submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due. Applicant must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI (See Sections 2.1 A. 5. t., of the modified permit).

40 CFR §63.7550(a): Must submit each report in Table 9 of MACT Subpart DDDDD that applies.

As per Table 9 of MACT Subpart DDDDD, information required are incorporated in 40 CFR §63.7550(c)(1) through (5) and as per 40 CFR §63.7550(b) this report must be submitted annually. These reporting requirements are incorporated in Section 2.1 A. 5. s., through u., of the modified permit.

The applicant wanted compliance reports reported to “DAQ on a 5-year basis.” Reports to DAQ are at a minimum reported annually.

IL. Actuals PAL Permit Requirements (Section 2.3 of the Permit)

A. Actuals PAL Permit Requirements for VOC emissions.

B. Actuals PAL Permit Requirements for NO_x emissions.

C. Actuals PAL Permit Requirements for Green House Gas (GHG) Emissions

Renewal of the permit does not change any limits, testing, monitoring, record keeping and reporting requirements.

The facility is operating and will continue to operate under the Actuals PAL of 750.6 tons of VOCs per year from all sources; Actuals PAL of 56.4 tons of NO_x per year from all combustions sources and Actuals PAL of 93,463 CO₂ equivalent (CO₂e or GHG) tons per year from all combustions sources.

V. NSPS, NESHAPS/MACT, PSD, Attainment Status, 112(r), Air Toxics (NCGS) 143-215.107(a)(5) (House Bill 952), CAM, Retain 2D .0958 and Compliance Status:

NSPS

Sources at this facility are subject to NSPS Subpart Dc “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units” and NSPS Subpart JJJJ “New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines.” There were no changes to these rules (See the “Regulatory Summary” in Section IV. xi., of this review, above).

NESHAP/MACT

Sources at this facility are also covered under “National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating (MACT Subpart MMMM), Plastic Parts and Products Surface Coating (MACT Subpart PPPP) and National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT, Subpart ZZZZ).” There were no changes to these rules (See the “Regulatory Summary” in Section IV. ix., of this review, above).

Attainment Status and Increments

This facility is located in Gaston County, which is currently designated as an attainment area. The minor source baseline dates for this County have been triggered for PM₁₀, SO₂ and NO_x emissions increases. There are no hourly emission increases of these pollutants due to this renewal.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in this rule.

CAM

The Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64) applies to pollutant-specific emissions units (PSEU) that are pre-control major sources and use a control device to comply with an emissions limit. None of the sources at this facility is subject to a CAM plan.

Compliance with Toxics - (NCGS) 143-215.107(a)(5) (House Bill 952)

The current permit is not subject to any toxic air pollutant requirements. This renewal will not increase any toxic air pollutant emissions to the environment and not present an unacceptable risk to human health and thus comply with North Carolina General Statute (NCGS) 143-215.107(a)(5) (House Bill 952).

15A NCAC 2D .0958: Work Practices for Sources of Volatile Organic Compounds

This regulation establishes work practice standards for a variety of sources having of VOC emissions. This facility is currently subject to RACT, thus, this regulation is not being removed from the modified permit (See Section IV. vi., and vii., of this review, above).

Compliance Status

Per the latest inspection performed on May 8, 2019 by Karyn Barksdale of the Mooresville Regional Office, the facility appeared to be in compliance.

VI. Consistency Determination, Comments, and Recommendations

A zoning consistency determination is not required for this renewal.

A professional engineer's seal is not required for this renewal.

The Regional Office, the applicant, and the SSCB (Stationary Source Compliance Branch) were provided a copy of the modified draft permit for this application for their comments and their comments were taken into consideration.

The Regional Office and the SSCB did not have any comments.

The applicant provided comments on 10/23/2019 and their comments were addressed as mentioned in the review above.

VII. Miscellaneous

- The responsible official in the draft permit matches the information on IBEAM.
- The facility address matches the information on IBEAM.
- There are no new insignificant activities being added with this renewal.
- All the regulatory references to 15A NCAC 02Q and 15A NCAC 02D have been verified.
- Every instance of the word "assure" has been changed to "ensure" in the modified permit.
- Removed all references from the bottom of the permitted sources table that no longer apply.
- Removed word "Subpart" from the permit sources table (i.e., NSPS Subpart IIII, etc.).
- All old testing requirements have been deleted.
- Updated language from the shell for regulations (example 15A NCAC 02D .0515, .0521, .0516, etc.).
(See Section IV. ii., through vi., of this review, above)
- Updated General Conditions.

VIII. Table of changes:

Table of changes made in Air Quality Permit No. 03926T47

| Page(s) | Section | Description of Change(s) |
|----------------|----------------|--|
| | 2.1 A. 5. | “15A NCAC 2D .1109: CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters” In Air Quality Permit No. 03926T46 - Removed |
| 7 | 2.1 A. 5. | New Regulation MACT Subpart DDDDD for Two Natural Gas/Propane/No. 2 Fuel Oil-fired Boilers (D Nos. ES-BLR-02 and ES-BLR-05) |
| 38 through 47 | | Updated “General Conditions” |